



**DRAFT AND DELIBERATIVE - Options**

**Alexis Lan** to: Fred Hauchman

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From: Alexis Lan/DC/USEPA/US  
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History: This message has been replied to.

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Fred

Take a look at let me know what you think.



Pavillion Peer Review Options.docx

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## **Options for Pavillion Peer Review**

### **Considerations**

- What's stated in the Peer Review Plan in the Science Inventory
  - Product completion date: January 2013
  - Peer Review expected to begin: 3<sup>rd</sup> quarter, FY 2012
- Public comment period has been extended until January 15, 2013, in anticipation of a February review.
- The public has been expecting that the review would likely occur around February 2013. Those who are following this closely, however, are likely to be suspecting a delay in the schedule.
- ERG had assembled a pool of candidate peer reviewers but this was put on hold.
- Report and data should go through an internal science review (for example by the Office of the Science Advisor) before going to peer review.
- Sustentative revisions to the draft 2011 Report will require a new public comment period.
- Current public health concerns for citizen's domestic wells will impact timing.

### **Options at a glance**

#### **1) No revision to the December 2011 Pavillion Report.**

##### **a. Timeframe**

- i. Panel meeting would occur in the 3<sup>rd</sup> quarter FY13
- ii. Report would be revised and published by 4<sup>th</sup> quarter FY13

#### **2) Make minor revisions to the December 2011 Report.**

##### **a. Timeframe**

- i. Panel meeting would occur 4<sup>th</sup> quarter FY13
- ii. Report would be revised and published by 1<sup>st</sup> quarter FY14

#### **3) Significant revision of the 2011 Report.**

##### **a. Timeframe**

- i. Panel meeting would occur 2<sup>nd</sup> quarter FY14
- ii. Report would be revised and published 3<sup>rd</sup> quarter FY14

#### **4) Conduct additional investigations and revise the Report accordingly.**

##### **a. Timeframe**

- i. New studies (including drilling new wells) start in FY13.
- ii. Peer review would be postponed until FY14.

### **Option 1 – No revision to the December 2011 Pavillion Report**

The package provided to peer reviewers after an internal science review will include Phase V data from EPA and USGS (appended to existing report) and responses to public comments (as a separate document).

The internal science review will inform the timeframe and development of the Report.

#### **Timeframe (assuming positive internal science review)**

- Panel meeting would occur 3<sup>rd</sup> quarter FY13
- Report would be revised and published by 4<sup>th</sup> quarter FY13.

#### **Pros**

- Minimizes delay from original schedule.

#### **Cons**

- Original Pavillion report would remain as the primary review document without integrating the new data or other revisions to improve defensibility and readability.
- Staffing and management timing issue – the peer review would be close to the SAB's consultation on the HF Study Progress Report (March, 2013) and the HF technical workshops (April, May)

### **Option 2 – Minor revision to the 2011 Report**

Make minimal revisions (correcting figures, fixing tables, editorial changes to language, etc...) as appropriate to the existing 2011 report.

The revised report will go through an internal science review. A new public comment period may be open depending on the degree of revisions made after this review.

The package provided to peer reviewers will include Phase V data from EPA and USGS (appended to existing report) and responses to public comments (as a separate document).

#### **Timeframe**

- Panel meeting would occur 4<sup>th</sup> quarter FY13.
- Report would be revised and published by 1<sup>st</sup> quarter FY14 (depending on public comment period)

#### **Pros**

- Minimizes delay from original schedule.

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- Provides an opportunity for some improvement in the defensibility and readability of the Report.

### **Cons**

- By not fully integrating the new data or other revisions will leave a number of important issues/concerns unaddressed in the Report.
- Staffing and management timing issue – the peer review would be close to the SAB's consultation on the HF Study Progress Report (March, 2013) and the HF technical workshops (April, May)

### **Option 3 – Significant revision of the 2011 Report**

Phase V data would be fully integrated, and parts of the report would be rewritten for clarity and defensibility.

Text will be added in response to major comments received to date.

The revised report will first go through an internal science review.

The revised report will go through a new public comment period.

### **Timeframe**

- Panel meeting would occur 2<sup>nd</sup> quarter FY14
- Report would be revised and published 3<sup>rd</sup> quarter FY14

### **Pros**

- Provides the best opportunity with existing data for improving the defensibility and readability of the Report

### **Cons**

- Delay likely to raise concern.
- Reaction from stakeholders, Congress and industry would likely be strong.

### **Option 4 – Conduct additional investigations and write new Report that will include all data/revised analyses**

### **Timeframe**

- New studies (including drilling new wells) start in FY13.
- Peer review would be postponed until FY14.

### **Pros**

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- New data will provide an opportunity to more definitively address outstanding issues

### **Cons**

- Delay likely to raise concern.
- Cost may be prohibitive.
- Reaction from stakeholders, Congress and industry would likely be strong.